

SEALED

AO 91 (Rev. 11/11) Criminal Complaint

FILED**UNITED STATES DISTRICT COURT**

for the

Western District of Texas

September 03, 2021

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASBY: EP
DEPUTY

United States of America)

v.)

James Sanny Jr.)

Case No. EP:21-M-01973-LS)

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 21, 2019 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 USC 2261A

Stalking

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.
Complainant's signature

John Bohovic, Special Agent

*Printed name and title*telephonically at 1:09 p.m. on 9/2/21
Sworn to before me and signed in my presence.Date: September 3, 2021*Judge's signature*City and state: El Paso, Texas

Leon Schydlower, U.S. Magistrate Judge

Printed name and title

PROBABLE CAUSE STATEMENT

1. I, John Bohovic, hereinafter referred to as Complainant, am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and conduct investigations of violations of Federal Criminal Law, including Stalking through the use of mail and computer systems.

2. This affidavit is submitted in support of an arrest warrant for James Sanny Jr. for violation of Title 18, United States Code, Section 2261A(2)(B).

3. On November 25, 2019 Federal Bureau of Investigation El Paso Division Agents interviewed Victim 1 and Victim 2 regarding an allegation of Stalking, through the use of mail and computer systems, by Sanny. Victim 1 met Sanny in 1998 and became pregnant with his child. Sanny did not want anything to do with the child and Victim 1 did not hear from Sanny again until 2013. During that time Victim 1 married Victim 2 and they lived together in El Paso with their children. In December 2013, Sanny showed up at the victim's home and asked to see Victim 1 and his daughter, hereafter known as KS. In the following days Sanny continued to visit the victim's home in an attempt to see Victim 1 and KS. Eventually Sanny was arrested for trespassing and on January 8, 2014, a protective order was issued against Sanny. The protective order prohibited Sanny from communicating directly with Victim 1 or any member of her household in a threatening or harassing manner.

4. On or around June 21, 2019, while still residing in El Paso, Texas, Victim 1 began receiving emails from an email address associated with Sanny. Victim 1 believed these emails were sent by Sanny. The emails contained ramblings and links to mental health articles. One of these emails, sent on September 18, 2019, was titled, "This Bitch is a reader (glasses) and now look two of your kids are too." In the body of the email was written, "Bitch is going to DIE. I'm going to get through herself." Sanny also emailed Victim 1 and Victim 2 links to pornography videos that depicted incest porn. A Grand Jury Subpoena was issued for the email address associated with Sanny, and the subscriber information that was returned indicated that the email address belonged to Sanny who was reportedly living with family in Maryland.

5. Sanny also attempted to contact KS through the internet. Sanny made multiple comments on KS's YouTube channel such as, "I could show you my pecker," "I've had voices tell me to think of you sexually and I'm finally getting it," and "K..... when will you be my whore."

6. From January 20 to February 6, 2020, while still living in El Paso, Victim 2 received phone calls from telephone number 301-861-3507. Victim 2 received approximately 36 voicemails. Records checks indicated the telephone number was associated with Sanny. Most of these voicemails contained nonsensical ramblings, however, at the end of one voicemail Sanny stated, "I want to fuck my daughter, I want to fuck my daughter." Sanny also called Victim 1 and

left approximately 17 voicemails containing nonsensical ramblings.

7. On February 11, 2020, Sanny was arrested by Charles County Sheriff's office in Maryland for second degree assault upon his father, James Sanny Sr. This assault violated a protective order which was issued on behalf of James Sanny Sr. While Sanny was incarcerated he sent numerous letters to the victims. These letters contained ramblings as well as one letter where Sanny suggested engaging in sexual activity with KS. Sanny was subsequently committed to the Maryland Department of Health and was released on July 10, 2020. After his release, Sanny proceed to call Victim 1 numerous times and sent her over 3,000 text messages. Sanny also left Victim 1 a voicemail message containing ramblings such as, "pooh pooh poopy," however during the middle of the message Sanny stated, "fucking die bitch." During this time, Sanny was reportedly living with family in Maryland while the victim family still resided in El Paso, Texas.

8. On June 4, 2021, Sanny was released from a Maryland State mental health facility and began contacting the victim family in El Paso, Texas shortly after his release. On June 7, 2021, Sanny sent text messages to Victim 2 consisting of gibberish, racial slurs, and nonsensical words. In total the victims received approximately 125 text messages from Sanny. On June 18, 2021, the victims received several anonymous packages shipped to their home address in El Paso which included: bread, chocolates, pumpkin seed oil, and potato chips. The packing slip listed "James" as the buyer. Based on past behavior, the victims believe these packages were sent by Sanny.

9. On July 16 and 17, 2021, the victims received two letters from Sanny through the Charles County Detention facility. These letters consisted of nonsensical words and phrases but also contained statements such as: "I want to fuck my daughter," "I want my daughter I'm so horny," "I want to fuck my daughter's ass," and "I want to lick my daughter's cunt." The return address on the letters listed James Sanny Jr., with a mailing address associated with Sanny and located in the state of Maryland.

10. Based on the above information, there is probable cause to believe that on or around June 21, 2019, and continuing up in and including July 26, 2021, in the Western District of Texas, James Sanny Jr. did commit Stalking, through the use of mail and computer systems, in violation of Title 18, United States Code, Section 2261A(2)(B).